

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
RICHLAND DIVISION

JAMES WILLSON CHESHER and)	
CHERYL ANN CHESHER,)	
)	C/A No. 3:15-CV-02123-ASB
Plaintiffs,)	
)	
vs.)	
)	
3M COMPANY, et al.,)	
)	
Defendants.)	

**DEFENDANT GENERAL ELECTRIC COMPANY'S ANSWERS TO
LOCAL RULE 26.01 INTERROGATORIES**

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER Upon information and belief Medicare may have a subrogation interest in the form of a Medicare lien.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER There is a jury demand in this case.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER General Electric Company states that it does not have any parent corporation and that no publicly held corporation owns 10% or more of General Electric Company stock. GE's subsidiary which has outstanding securities in the hands of the public (debt, equity or other types of securities) is General Electric Capital Corporation. Publicly-traded companies in which GE and affiliates (including GE Capital and GE Capital Equity) own 10% or more of the outstanding stock are APR Energy plc (London Stock Exchange), Synchrony Financial, and Townsquare Media, Inc.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER Plaintiffs chose to venue their state court action in Columbia. Pursuant to 28 U.S.C. 1442(a)(1) (federal officer removal), CBS Corporation removed this action from the Richland County Court of Common Pleas.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER No.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER General Electric Company does not contend it was improperly identified.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER General Electric Company asserts it is entitled to immunity as a government contractor. Discovery may show that the injuries alleged by Plaintiffs were the result of exposure to asbestos from products manufactured by bankrupt entities.

Dated: May 29, 2015.

Respectfully submitted:

EVERT WEATHERSBY HOUFF

/s/ Jennifer M. Techman

Jennifer M. Techman

SC Fed Bar No. 8028

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CERTIFICATE OF SERVICE

I certify that the foregoing Defendant General Electric Company's Answers to LR 26.01 Interrogatories was electronically filed in this case and was e-mailed to all counsel of record by filing with the ECF system on May 29, 2015.

/s/ Jennifer M. Techman
Jennifer M. Techman

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